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protected content from said source device <u>in response to the comparison</u>. However, Graunke fails to teach the above-identified steps, and hence fails to anticipate Claim 1.

The Final Office action argues Graunke teaches receiving, at said source device, an approval code associated with said source and sink devices as step 209, and determining, in said source device, a local code using data associated with said source and sink devices as step 208, both in Fig. 2 (reproduced herein for the Examiner's convenience). *See, 7/17/2006 Office action, pg. 4, ll. 5-8.* The Final Office action then argues that Graunke teaches to compare, in the source device (102), at least a portion of a source device received approval code to at least a portion of a source device determined local code as step 210. *See, 7/17/2006 Office action, pg. 4, ll. 9-10.* Finally, the Office action argues that Graunke teaches to verify that the sink device is authorized to receive the protected content from said source device in response to the comparison at col. 3, lines 6-22 and 51-56. *See, 7/17/2006 Office action, pg. 4, ll. 10-12.* Applicant traverses these assertions.
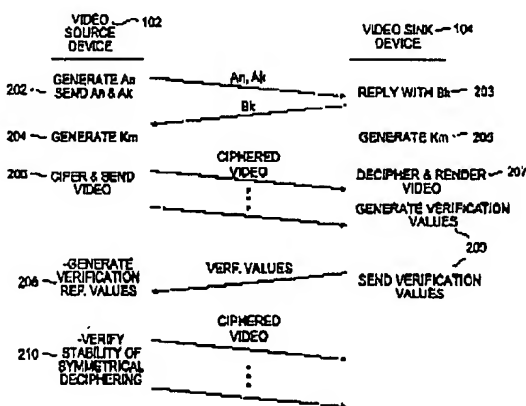

FIG. 2

Instead, a detailed review of the Final Office action cited portions of Graunke clearly reveals that <u>Graunke only **verifies the deciphering stability** of sink device 104 in response to the comparison of verification values in block 208. Graunke does not verify that the sink device is **authorized to receive** the protected content from the source device in response to the comparison of block 208</u> – as is recited by Claim 1. The claimed invention calls for verifying that the sink device is <u>authorized to receive</u> the protected content from said source device <u>in response to the comparison</u>. In contrast, Graunke instead teaches:

> Upon receiving each of these verification values, source device 102 compares the received verification value to the corresponding one of the verification reference value <u>to determine and confirm that indeed the ciphered video content is being properly deciphered by sink device 104</u> (block 210). *Col. 3, ll. 51-56.*

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This is further evidenced by the description of block 210 in Fig. 2 of Graunke, which recites "-VERIFY[ING] STABILITY OF SYMMETRICAL DECIPHERING".

In view of the foregoing, Applicant submits that Graunke fails to teach or suggest at least the limitations of: (1) comparing in the source device, at least a portion of a source device received approval code to at least a portion of a source device determined local code; and (2) verifying that the sink device is authorized to receive the protected content from said source device in response to the comparison – as is recited by Claim 1. Reconsideration and removal of this 35 U.S.C. 102 rejection is requested.

The above notwithstanding, Applicant notes Graunke teaches a process wherein the source device 102 provides a basis value (random number An) to the symmetric ciphering/deciphering process, and its identifier (Ak) to sink device 104 at block 202 (Fig. 2). In response, sink device 104 replies with its identifier (Bk) at block 203. Upon exchanging the above information, source and sink devices 102 and 104 independently generate their respective copies of an authentication key (Km) using Ak and Bk at blocks 204 and 205. Source device 104 then ciphers and transmits content using the random number An and shared key Km at block 206. Sink device 102 then receives and deciphers the ciphered content at block 207. Finally, Graunke asserts that the verification reference value related blocks 208 and 209 are "integral parts" of the ciphering and deciphering steps, respectively. *See, e.g., col. 3, ll. 3-15 and ll. 32-55.*

Thus, Graunke teaches that the verification reference values are compared as part of the content ciphering and deciphering process itself – rather than any authorization process. Accordingly, as the verification reference values comparison (at block 210) occurs only after a scrambling/descrambling key Km has been determined and protected content has actually been ciphered, transmitted to the sink device, and deciphered by the sink device, it is inconceivable that these verification reference values may yet somehow be used in "verifying that the sink device is authorized to receive the protected content from said source device" in the first place.

In view of the foregoing, Applicant submits that Graunke fails to anticipate Claim 1, at least by virtue that it fails to: (1) compare, in the source device, at least a portion of a source device received approval code to at least a portion of a source device determined local code; and (2) verify that the sink device is authorized to receive the protected content from said

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source device in response to the comparison. Reconsideration and removal of the rejection of Claim 1 is requested.

Applicant also requests reconsideration and removal of the rejections of Claims 2-4 and 12 as well, at least by virtue of these claims' ultimate dependency upon a patentably distinct base Claim 1.

In similar fashion, independent Claim 5 recites, in part, "comparing at least a portion of said approval code to at least a portion of said local code, and <u>verifying that the sink device is authorized to receive the protected content from the source device in response to the comparison.</u>" Accordingly, Applicant respectfully requests reconsideration and removal of the rejection of Claim 5 for at least the foregoing reasons as well.

Applicant also requests reconsideration and removal of the rejections of Claims 6-11, at least by virtue of these claims' ultimate dependence from patentably distinct base Claim 5.

Turning now to independent Claim 13, it recites, in part, "comparing said identifier with said plurality of security keys and <u>verifying that said second device is authorized to receive said protected content in response to the comparison.</u>" Accordingly, Applicant respectfully requests reconsideration and removal of the rejection of Claim 13 for at least the foregoing reasons.

Applicant also requests reconsideration and removal of the rejections of Claims 14-16, at least by virtue of these claims' ultimate dependence from patentably distinct base Claim 13.

With regard to independent Claim 17, it recites, in part, "<u>verifying said source device and sink device are authorized to have access to content if said authorization identifier and local identifier correspond to one another.</u>" Accordingly, Applicant respectfully requests reconsideration and removal of the rejection of Claim 17 for at least the foregoing reasons.

Applicant also requests reconsideration and removal of the rejection of Claim 18, at least by virtue of this claim's dependence from patentably distinct base Claim 17.

Turning now to Claim 19, it recites, in part, "comparing at least a portion of said approval code to at least a portion of said local code, and <u>verifying that said digital television is authorized to receive said protected content from said set top box in response to the comparison.</u>"

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Accordingly, Applicant respectfully requests reconsideration and removal of the rejection of Claim 19 for at least the foregoing reasons.

Applicant also requests reconsideration and removal of the rejection of Claim 20, at least by virtue of this claim's dependence from patentably distinct base Claim 19.

Independent Claim 21 recites, in part, "comparing at least a portion of said approval code to at least a portion of said local code, and verifying that said digital television is authorized to receive said protected content from said digital video recorder in response to the comparison." Accordingly, Applicant respectfully requests reconsideration and removal of the rejection of Claim 20 for at least the foregoing reasons.

Applicant also requests reconsideration and removal of the rejection of Claim 21, at least by virtue of this claim's dependence from patentably distinct base Claim 20.

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CONCLUSION

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

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